



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Anne P. Petera, Treasurer  
Republican Party of Virginia Inc.  
115 East Grace Street  
Richmond, VA 23219

MAY 9 2001

Identification Number: C00001305

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

Dear Ms. Petera:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received a transfer(s) from the National Republican Senatorial Committee and HAMPAC which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the

treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule B supporting Line 21(b) discloses payments to Bush 2000 Spalding for *Yard Signs*. Please amend your report to clarify the ultimate payee of these disbursements.

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$1,173,714.00 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$1,071,715.48 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for several joint expenditures to various

vendors. Note that the unique identifying code for an event is not considered an adequate description of purpose. Please amend your report to include this missing information.

-Please clarify all expenditures made for ad placement, ad production, media production & placement, media placement, and radio spot production on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-You have received a contribution from LHN Associates Limited Partnership, which appears to be an unincorporated proprietorship or partnership. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker

Reports Analyst

Report Analysis Division

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

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FOR LINE NUMBER  
12

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (in Full)**  
**Republican Party of Virginia, Inc.**

<b>Full Name, Mailing Address, and ZIP Code</b> NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW  WASHINGTON DC 20002  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>   <b>Aggregate Year-to-Date</b> > \$ 1930400.00	<b>Date (month, day, year)</b> 10/20/2000	<b>Amount of Each Receipt this Period</b> 4300.00 party transfer
<b>Full Name, Mailing Address, and ZIP Code</b> NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW  WASHINGTON DC 20002  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>   <b>Aggregate Year-to-Date</b> > \$ 1991400.00	<b>Date (month, day, year)</b> 10/20/2000	<b>Amount of Each Receipt this Period</b> \$1000.00 party transfer
<b>Full Name, Mailing Address, and ZIP Code</b> NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW  WASHINGTON DC 20002  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>   <b>Aggregate Year-to-Date</b> > \$ 1988000.00	<b>Date (month, day, year)</b> 10/23/2000	<b>Amount of Each Receipt this Period</b> 4800.00 party transfer
<b>Full Name, Mailing Address, and ZIP Code</b> NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW  WASHINGTON DC 20002  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>   <b>Aggregate Year-to-Date</b> > \$ 2015000.00	<b>Date (month, day, year)</b> 11/24/2000	<b>Amount of Each Receipt this Period</b> 19600.00 party transfer
<b>Full Name, Mailing Address, and ZIP Code</b> NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW  WASHINGTON DC 20002  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>   <b>Aggregate Year-to-Date</b> > \$ 2080100.00	<b>Date (month, day, year)</b> 10/24/2000	<b>Amount of Each Receipt this Period</b> 84500.00 party transfer
<b>Full Name, Mailing Address, and ZIP Code</b> NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW  WASHINGTON DC 20002  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>   <b>Aggregate Year-to-Date</b> > \$ 2112300.00	<b>Date (month, day, year)</b> 10/26/2000	<b>Amount of Each Receipt this Period</b> 32200.00 party transfer
<b>Full Name, Mailing Address, and ZIP Code</b> NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW  WASHINGTON DC 20002  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>   <b>Occupation</b>   <b>Aggregate Year-to-Date</b> > \$ 2210900.00	<b>Date (month, day, year)</b> 10/26/2000	<b>Amount of Each Receipt this Period</b> 96500.00 party transfer
<b>SUBTOTALS of Receipts This Page (Optional)</b> .....			
<b>TOTALS This Period (last page this line number only)</b> .....			

<b>SCHEDULE A</b>	<b>ITEMIZED RECEIPTS</b>	Use separate schedule(s) for each category of the Detailed Summary Page	25173 FOR LINE NUMBER 11C
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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (in Full)**  
Republican Party of Virginia, Inc.

Full Name, Mailing Address, and ZIP Code RIGHT TO WORK POLITICAL ACTION COMMITTEE 5240 FORT ROYAL ROAD/SUITE 211  SPRINGFIELD VA 22151  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer  Occupation  Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 10/19/2000	Amount of Each Receipt this Period 1000.00
Full Name, Mailing Address, and ZIP Code YELLOW CORPORATION POLITICAL ACTION COMMITTEE 10990 ROE AVENUE  OVERLAND PARK KS 66211  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer  Occupation  Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 10/19/2000	Amount of Each Receipt this Period 1000.00
Full Name, Mailing Address, and ZIP Code NATIONAL FRANCHISEE ASSOCIATION PAC (NFA-PAC) POST OFFICE BOX 14261  WASHINGTON DC 20044  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer  Occupation  Aggregate Year-to-Date > \$ 5000.00	Date (month, day, year) 10/23/2000	Amount of Each Receipt this Period 5000.00
Full Name, Mailing Address, and ZIP Code Hampco P O Box 758  Rose Hill NC 28456  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer  Occupation  Aggregate Year-to-Date > \$ 4000.00	Date (month, day, year) 11/03/2000	Amount of Each Receipt this Period 4000.00
Full Name, Mailing Address, and ZIP Code TRIGON BLUE CROSS BLUE SHIELD FEDERAL POLITICAL ACTION COMMITTEE (TRIGON BCBS FEDERAL PAC) 2015 STAPLES MILL ROAD  RICHMOND VA 23230  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer  Occupation  Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 11/03/2000	Amount of Each Receipt this Period 250.00
Full Name, Mailing Address, and ZIP Code CONSERVATIVE LEADERSHIP POLITICAL ACTION COMMITTEE 3128 NORTH SEVENTEENTH STREET  ARLINGTON VA 22201  Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer  Occupation  Aggregate Year-to-Date > \$ 2500.00	Date (month, day, year) 11/14/2000	Amount of Each Receipt this Period 1000.00

**SUBTOTALS** of Receipts This Page (Optional) .....

**TOTALS** This Period (last page this line number only) .....

**12250.00**

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	21173 FOR LINE NUMBER 12
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Republican Party of Virginia, Inc. <span style="float: right;">S</span>					
Full Name, Mailing Address, and ZIP Code SCHROCK, EDWARD L. PO BOX 81480 VIRGINIA BEACH VA 23468		Name of Employer		Date (month, day, year) 10/26/2000	Amount of Each Receipt this Period 36500.00 transfer
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		Aggregate Year-to-Date > \$ 36500.00	
Full Name, Mailing Address, and ZIP Code NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW WASHINGTON DC 20002		Name of Employer		Date (month, day, year) 10/27/2000	Amount of Each Receipt this Period 13400.00 party transfer
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		Aggregate Year-to-Date > \$ 224200.00	
Full Name, Mailing Address, and ZIP Code NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW WASHINGTON DC 20002		Name of Employer		Date (month, day, year) 10/30/2000	Amount of Each Receipt this Period 7300.00 party transfer
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		Aggregate Year-to-Date > \$ 2231500.00	
Full Name, Mailing Address, and ZIP Code NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW WASHINGTON DC 20002		Name of Employer		Date (month, day, year) 10/31/2000	Amount of Each Receipt this Period 10300.00 party transfer
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		Aggregate Year-to-Date > \$ 2241800.00	
Full Name, Mailing Address, and ZIP Code NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW WASHINGTON DC 20002		Name of Employer		Date (month, day, year) 11/02/2000	Amount of Each Receipt this Period 56500.00 party transfer
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		Aggregate Year-to-Date > \$ 2298300.00	
Full Name, Mailing Address, and ZIP Code NORTH CAROLINA REPUBLICAN EXECUTIVE COMMITTEE 1410 HILLSBOROUGH ST PO BOX 12905 RALEIGH NC 27605		Name of Employer		Date (month, day, year) 11/03/2000	Amount of Each Receipt this Period 7800.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		Aggregate Year-to-Date > \$ 7800.00	
Full Name, Mailing Address, and ZIP Code NATIONAL REPUBLICAN SENATORIAL COMMITTEE 425 SECOND STREET NW WASHINGTON DC 20002		Name of Employer		Date (month, day, year) 11/07/2000	Amount of Each Receipt this Period 5600.00 party transfer
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		Aggregate Year-to-Date > \$ 2303800.00	
SUBTOTALS of Receipts This Page (Optional) .....					
TOTALS This Period (last page this line number only) .....					422000.00

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